

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

STEVEN GILLMAN, as Personal  
Representative of the ESTATE OF MEGAN  
ANN MILLER, Deceased,

Plaintiff's,

-vs-

CITY OF TROY and JULIE GREEN-  
HERNANDEZ,

Defendants.

CA: 21-12762

HON: MARK A. GOLDSMITH  
MAG. KIMBERLY G. ALTMAN

JOHNSON LAW, PLC  
Ven R. Johnson (P39219)  
Ayanna D. Hatchett (P70055)  
Attorneys for Plaintiff  
535 Griswold, Ste. 2632  
Detroit, MI 48226  
(313) 324-8300  
[vjohnson@venjohnsonlaw.com](mailto:vjohnson@venjohnsonlaw.com)  
[ahatchett@venjohnsonlaw.com](mailto:ahatchett@venjohnsonlaw.com)

Lori Grigg Bluhm (P46908)  
Julie Quinlan Dufrane (P59000)  
Attorneys for City of Troy  
500 W. Big Beaver Road  
Troy, MI 48084  
(248) 524-3320  
[bluhmlg@troymi.gov](mailto:bluhmlg@troymi.gov)  
[j.dufrane@troymi.gov](mailto:j.dufrane@troymi.gov)

ROSATI SCHULTZ JOPPICH  
& AMTSBUECHLER PC  
BY: Margaret T. Debler (P43905)  
Holly S. Battersby (P72023)  
Michael T. Berger (P77143)  
Attorneys for Green-Hernandez  
27555 Executive Drive, Ste. 250  
Farmington Hills, MI 48331  
(248) 489-4100  
[mdebler@rsjalaw.com](mailto:mdebler@rsjalaw.com)  
[hbattersby@rsjalaw.com](mailto:hbattersby@rsjalaw.com)  
[mberger@rsjalaw.com](mailto:mberger@rsjalaw.com)

**STIPULATED**  
**PROTECTIVE ORDER**

**STIPULATED PROTECTIVE ORDER**

WHEREAS, the parties stipulate and agree to the following regarding disclosure of certain documents and other materials and information concerning the disputed issues in the case before this Court:

NOW THEREFORE, it is HEREBY ORDERED that:

1. In connection with this Stipulated Order, "Protected Documents" shall mean: all documents and recordings relating to the City of Troy's investigation into the death of Megan Ann Miller which is the subject of the above-named lawsuit. These materials include but are not limited to all policies, procedures, rules, regulations, general orders, training materials, police reports, witness statements, copies of police in-car video and audio recordings, booking area audio/video recordings of the Troy police department, lock-up area audio/video recordings inside the Troy police department, recorded interviews, employee personnel files and/or internal investigations files of the Troy Police Department.

2. Any document or recording produced by any party to this action for inspection or recording shall be used only of the purposes of litigating this case (*Gillman v City of Troy, et al* Case No. 21-12762) and for no other purpose.

3. Except as specifically ordered by the Court, Protected Documents may be given, shown, made available to, discussed with, or communicated only to (a) counsel of record, and said counsel's employees to whom it is necessary that the material be disclosed for purposes of this proceeding; (b) such counsel's formally retained third party agents, consultants and independent experts who are employed for the purposes of this proceeding; (c) Plaintiff, Defendants, or employees of Plaintiff, Defendants, or employees of either who are actively assisting in the prosecution or defense of this litigation; and (d) fact witnesses to be called to testify in this action.

Documents designated as Protected Documents shall not be disclosed to anyone other than the individuals specified in this paragraph. All such individuals must be shown and sign a copy of this order agreeing thereby to be bound by the terms of this Order.

4. Nothing in paragraph three (3) shall prevent any party from using the Protected Documents in discovery or in any court proceeding including, but not limited to: (a) discovery depositions, (b) motions, briefs, and pleadings, (c) argument before the Court, or (d) trial or on appeal.

5. If any Protected Documents are to be filed with the Court, the party submitting such documents shall file the documents under seal. If any papers

filed with the Court contain documents designated as Protected Documents, such papers shall be marked and treated according to the applicable terms of this Order.

6. All documents and copies of documents subject to this Order shall be returned and surrendered to the producing party within thirty (30) days after the conclusion of this case, defined as the filing of a stipulated dismissal, or the entry of voluntary dismissal as to all claims or a final, non-appealable order disposing of this proceeding.

7. Any portions of deposition transcripts, including exhibits, that relate to Protected Documents shall be transcribed separately and shall be placed under seal and conspicuously marked as subject to a protective order and kept in accordance with this Order.

8. All counsel shall be obligated to maintain the confidentiality of all notes, abstractions or other work product derived from or containing information contained in Protected Documents and shall not disclose or reveal the contents of said notes, abstractions, or other work product after confidential documents and information are returned and surrendered.

9. This Order shall become effective immediately upon execution by the Court.

10. Pursuant to LR 5.3, a party shall not file or otherwise tender to the Clerk any item proposed for sealing unless the Court has granted the motion or entered. Therefore, this order does not authorize the filing of any documents or other matter under seal. Documents or other matter may be sealed only if authorized by statute, rule, or order of the Court.

11. A party seeking to file such items under seal shall file and serve a motion or submit a proposed stipulated order that sets forth: i) the authority for sealing; ii) an identification and description of each item proposed for sealing; iii) the reason that sealing each item is necessary; iv) the reason that means other than sealing are not available or unsatisfactory to preserve the interest advanced by the movant in support of sealing; v) a memorandum of legal authority supporting sealing.

IT IS SO ORDERED.

Dated: February 16, 2023  
Detroit, Michigan

s/Mark A. Goldsmith  
MARK A. GOLDSMITH  
United States District Judge

[signatures continue on following page]

Approved:

s/Margaret Debler by consent given 11/14/2022  
and as revised, consent given 11/17/2022

Attorneys for Defendant Green-Hernandez  
27555 Executive Drive, Ste. 250  
Farmington Hills, MI 48331  
(248) 489-4100  
Margaret T. Debler (P43905)

s/ Julie Quinlan Dufrane

Attorneys for City of Troy  
500 W. Big Beaver Road  
Troy, MI 48084  
(248) 524-3320  
j.dufrane@troymi.gov  
(P59000)

/s/ Ayanna D. Hatchett, and as revised, consent  
given 11/17/2022 for the revisions

AYANNA D. HATCHETT (P70055)  
Attorney for Plaintiff  
535 Griswold, Ste. 2632  
Detroit, MI 48226  
(313) 324-8300  
ahatchett@venjohnsonlaw.com